AOPA Comments to JPDO on National Airspace System Transformation

The Aircraft Owners and Pilots Association (AOPA) is a membership organization that represents over 400,000 general aviation pilots. AOPA members utilize 200,000 aircraft to fly throughout the country, landing at over 5,000 public use airports. We would like to take this opportunity to provide the Joint Program Development Office (JPDO) with our perspective on the message that we have heard and the strategies we have seen to date.

AOPA supports the JPDO effort to develop a long-range plan, identifying key research and development strategies for transformation of the National Airspace System (NAS) in the United States. Given this objective, the needs of general aviation should be woven into this plan to ensure that the general aviation community continues to grow and flourish. Below you will find a listing of the key elements that must be considered.

1. **ATC must remain a government provided service with no fee for service.** AOPA has long opposed an air traffic control system that collects user fees. Just like today's waterway and road system, the national airspace system is a publicly available government transportation system. Transportation is the backbone of commerce for Americans. Deviating from this perspective would damage America's ability to maximize aviation. User fee discussions distract the community from the important tasks at hand including NAS transformation. Instead, the aviation community should focus on stabilizing the aviation system with technological and operational enhancements.

2. **Preservation of general aviation airports and infrastructure.** Transformation of the NAS cannot happen with fewer and fewer airports. Many published reports highlight the need for more capacity, and a diverse network of airports nationwide. While the FAA is struggling mightily to find new system capacity, airports are closing regularly. Actively preserving airports is a very low-cost investment in the future national airspace system. The transformation should include a focused effort to keep airports open. It is an affordable investment in future capacity needs.

3. **Changes to homeland security.** The Transportation Security Administration (TSA) has confirmed that general aviation operations are not a threat to national security. However, general aviation operations are impacted by the government's use of airspace restrictions for security reasons. Airspace such as the Air Defense Identification Zone (ADIZ) around Washington, DC and presidential movement airspace restrictions are two examples of new operating requirements that are not supported with necessary air traffic services. If not completely banned, pilots must

adhere to strict procedures when operating within such airspace areas. The procedures are normally associated with aircraft operating under Instrument Flight Rules (IFR). However, the FAA is unable to provide an IFR level of service to every IFR and VFR aircraft during the restricted operations. The affect on all airspace users is substantial. Not only is general aviation impacted, airspace congestion builds quickly and commercial operations are delayed. Therefore, it is imperative that the transformation of the air transportation system includes the necessary plans, policies, infrastructure, and staffing necessary to support the operational requirements imposed by airspace security procedures.

Pilots are keenly aware of and are willing to individually enhance the security of their operations without government regulation. The Federal government in partnership with industry, has taken steps to secure general aviation. One example is the AOPA Airport Watch program. Collaboration has also resulted in recommended guidelines for security enhancements at the Nation's privately and publicly owned and operated airports. Additional regulation is unnecessary at this time

4. **Access to the aviation system for VFR users.** The vast majority of general aviation flights are conducted under Visual Flight Rules (VFR). New technologies and procedures are emerging that enable general aviation to operate safely. Unmonitored VFR operations are a major benefit to general aviation. The six-week period of "no VFR" following the terrorist attacks on September 11, 2001 was difficult to survive. Losing the ability to operate VFR without direct oversight from ATC would cripple general aviation and the impact would be disastrous. NAS transformation should result in the preservation of VFR access to both airports and airspace.

5. **Reliable, consistent access to terminal airspace areas.** Planning, which focuses on terminal operations, should not ignore the needs of all of the users in a metropolitan region. Today's biggest terminal airspace areas are also major centers of commerce. Access to these hubs of commerce should not be limited to the hubs of airlines. AOPA members increasingly use their personal aircraft for business travel. Public access to these metropolitan areas must be at the core of the transformation of the NAS.

   Whether a general aviation pilot is operating on instruments or visually, the terminal airspace areas must be able to accept them. This is not only an airspace issue. Small general aviation airports near the centers of large cities need to be "general aviation friendly". Sufficient services are needed to facilitate the utilization of the airports. Ensuring general aviation airports have the necessary infrastructure and services also

ensure that larger capacity aircraft use the valuable landing slots at the major hub airports.

6. **High quality, reliable, and free access to weather.** A major improvement is required to the way in which the FAA disseminates timely information. Weather data needs to be provided by the FAA without fees. Timely distribution of graphic weather, airspace and operational restrictions needs to be useable, and easily attainable. A new requirement is a means for general aviation pilots to participate in collaborative decision making activities. All of these services need to be delivered to the pilot in-flight as well, which requires data link. For general aviation, a transformation of the FAA's information dissemination capabilities is the single largest system enhancement required.

7. **Affordable, high-quality space based navigation.** Since 1990, AOPA has supported the FAA's efforts to transition from a ground based navigation infrastructure to a space based infrastructure. Many general aviation pilots have made this transition. The FAA should continue to mature WAAS, modernize GPS, and ensure Galileo interoperability so that high quality positioning and navigation are available. The use of space based infrastructure for additional applications beyond navigation will require unprecedented performance from these systems.

8. **Minimizing the impact of new vehicle types operating in the NAS.** A fundamental AOPA belief is that United States airspace is a publicly accessible resource. While today's operators must identify the best means to minimize the impact on each other's operation, this same philosophy must be extended to future aerospace vehicles as well. Whether the new vehicle types are remotely piloted or space-bound, the impact must be minimized to ensure that safety is maintained and operational benefits to the rest of the community are retained. One example of a concern held by AOPA is the creation of new special use airspace, solely intended to facilitate certain operations. Instead, these new vehicles should be required to fit within the existing NAS, not be separate from the rest of the NAS.

9. **Identify acceptable equipment transition strategies.** Today within the aviation community, there exists a demarcation point between infrastructure and equipment on board aircraft. In the future, aircraft will carry around much of the total system capability. Therefore, the burden of costs may also need to be realigned. If the transformation cannot identify relatively affordable equipment, strategies must be executed which involve assistance from the government. In other words, if the transformation requires essential elements of the NAS infrastructure to be on board the aircraft, then the Federal investment dollars should also be provided for the infrastructure to be purchased and installed in the aircraft.

10. **Realistic and achievable environmental standards.** Changes to minimize environmental impact are always a challenge. While there are many aircraft, the total number of engines compared to many other industries is relatively small. The impact on the environment is proportionally small. Noise issues need to be balanced against the benefits of air transportation. New standards must be implemented so that the changes to aircraft can be planned in advance, and applied to forward-fit designs.

11. **United States leadership for the global aviation community.** The United States National Airspace System supports a very diverse group of aeronautical operations *and* is the model of safety, efficiency and capacity management. The United States should be aggressively working to proliferate this robust and diverse system globally. The United States should encourage other countries to modernize their NAS so that it supports VFR operations without air traffic control involvement. Convincing other countries that they should support their citizens' ability to maximize the utility of general aviation aircraft is just one benefit from a strong United States presence in global aviation.